

Bradley, Megan

From: Vogler, Tina <tvogler@pa.gov>
Sent: Friday, November 22, 2019 1:19 PM
To: Bertram, Emily
Subject: RE: [External] FW: Braskem RACT 23-00012
Attachments: 23-00012 draft 11-22-2019.pdf; Comment & Response Braskem RACT 11-2019.pdf

Emily,

Here is DEP's response to EPA comments made by Cynthia Stahl, received in DEP on 6/20/2017. The revised proposed RACT permit is attached. P.28 #002, p.30 #006(e) and p.32 #009(b)(ii) are conditions for emissions limits added to the original RACT ii (issuance 4/3/2017) per comment #3. I've also looked at the RACT 1 permit, apart from the emissions limitations added in response to comment #3, and sought conditions that would be in the proposed RACT I/II permit that are at least as stringent as RACT I (Attachment 3).

Please let me know if DEP has answered EPA's concerns.

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From: Bertram, Emily <Bertram.Emily@epa.gov>
Sent: Friday, November 15, 2019 3:44 PM
To: Vogler, Tina <tvogler@pa.gov>
Cc: Beach, James <jamesbeach@pa.gov>
Subject: RE: [External] FW: Braskem RACT 23-00012

Hi Tina,

Thanks, that would be good. I would also if I were you double check the RACT I SIP'd requirements for Braskem and ensure that the proposed case by case RACT II is at least the same if not more stringent than RACT I. I am thinking this was the topic of the conversation we had last year. If I have the opportunity next week, I will see if I can pull the FR for Epsilon for the SIP'd RACT I. I'm sure this was done awhile back but I think I'll have to recreate a record on this one!

Emily Bertram
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From: Vogler, Tina <tvogler@pa.gov>
Sent: Friday, November 15, 2019 2:26 PM
To: Bertram, Emily <Bertram.Emily@epa.gov>

Cc: Beach, James <jamesbeach@pa.gov>

Subject: RE: [External] FW: Braskem RACT 23-00012

Emily,

I looked back through the files and it appears that a formal response to EPA's comments on the RACT II (by Cynthia Stahl) was prepared by Xiaoyin Sun (then permit writer, who has retired), but never sent on to EPA, probably because of issues with the comment on the 10 pounds/hr and 240 pounds/day VOC limits for Plant # 1 (Comment #3).

I'll prepare a response to Comment #3, in light of current EPA guidance, and send the responses along to EPA.

Have a good weekend as well.

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From: Bertram, Emily <Bertram.Emily@epa.gov>

Sent: Friday, November 15, 2019 10:21 AM

To: Vogler, Tina <tvogler@pa.gov>

Cc: Tulloch-Reid, Janine <jtullochre@pa.gov>; Beach, James <jamesbeach@pa.gov>; Schmitt, Ellen <Schmitt.Ellen@epa.gov>

Subject: [External] FW: Braskem RACT 23-00012

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Good morning Tina,

I apologize for the delay in getting back to you regarding Braskem. Ellen Schmitt (from Planning) had reviewed and prepared EPA's comments on Braskem's RACT II proposal, however, Ellen is out of the office until Dec 4. I remember EPA and SERO having a phone conversation regarding EPA's comments on Braskem's proposed CbC RACT II back at the beginning of 2018. However, I don't see a record of a response to comment from SERO. This write up from Braskem that you attached regarding one of EPA's comments may partially address it that particular comment, but I am not sure it would in entirety. Did SERO ever send EPA a response to comment document? If so, I apologize but can you resend it? Perhaps it makes sense on this one to regroup and have a call so we can get it out the door? I am cc'ing Janine and Jim, as I think one or both of them were involved in this a few years back. I believe EPA's concern was in regard to Braskem (then Epsilon)'s RACT I requirements and anti-backsliding?

Could we set up a call to discuss and regroup/get on the same page? I am available Monday-Thursday of next week, with the exception of a few meetings. Unfortunately, Ellen will not be around to join, but I can try and pick up the pieces?

Thanks, have a nice weekend!

Emily

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From: Vogler, Tina <tvogler@pa.gov>
Sent: Monday, October 07, 2019 4:14 PM
To: Bertram, Emily <Bertram.Emily@epa.gov>
Subject: Braskem RACT 23-00012

Emily,

To change the subject. .. Here is Braskem's RACT proposal, addressing Cynthia Stahl's Comment #3 made in her letter dated 6/14/2017 to James Rebarchak.

We would appreciate comments from EPA.

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